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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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March 12, 2014

Enrique Manzanilla
Director, Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Manzanilla:

Thank you very much for meeting with us on February 28, 2014. As you could see from our presentation, the contaminated groundwater in the North Basin area is a very serious problem that has impacted the quality of the Orange County Groundwater Basin that supplies 70% of the total demand of 2.4 million people in 22 cities.

While we have taken the initiative to characterize the groundwater contamination and pursue PRPs, the Orange County Water District (OCWD) now needs the help of state and federal regulatory agencies. OCWD recently met with the Santa Ana Regional Water Quality Control Board (RWQCB) and the Department of Toxic Substances Control (DTSC). Both state agencies are taking action at some but not all of the sources of the contamination, and several of the PRPs are not preventing continued off-site contaminant migration. More importantly, no regulatory agency is taking a holistic approach nor has an overall protection plan for North Basin groundwater.

In our meeting, EPA expressed a willingness to participate with the RWQCB and DTSC in a **North Basin Working Group** that OCWD will propose. We also discussed the following actions to follow up on our meeting:

- **Build on State and OCWD PRP Search:** OCWD will send a package of information on sources of contamination and PRPs to Dusty Minor.
- **Investigation and Potential Action on Contaminated Sites:** Dusty Minor will send a draft joint prosecution agreement to Scott Sommer.
- **Potential NPL Listing:** OCWD will send a package of information on several of the worst facilities or sources of contamination to Clancy Tenley.

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Mr. Enrique Manzanilla
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John Lyons stated that he would get back to us after you meet internally and confer with the RWQCB and DTSC. We also appreciate your ideas to reach out to the communities impacted by the groundwater contamination.

If you have any questions, please contact me at 714-378-3297 (mwehner@ocwd.com). You may also contact Roy Herndon, OCWD's Chief Hydrogeologist, at 714-378-3260 (rherndon@ocwd.com), Scott Sommer, Attorney for OCWD, at 415-983-1813 (scott.sommer@pillsburylaw.com), or Keith Takata, Consultant for Pillsbury, at 650-862-1161 (keith@keithtakata.com).

Thank you again for a very productive and encouraging meeting. I look forward to working with EPA, RWQCB, and DTSC to address the groundwater contamination in Orange County.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Wehner".

Mike Wehner
Assistant General Manager

cc: Kurt Berchtold, RWQCB
John Scandura, DTSC
Tom Cota, DTSC